

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

**In re: Leonard J. Dingess
Angela F. Dingess
Debtor(s).**

**Case No. 11-74000
Chapter 13**

NOTICE OF MOTION TO SUBSTITUTE COUNSEL

The above named Debtor(s), by proposed counsel, have filed a Motion for Substitution of Counsel with the Court. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one.

If you want to be heard on this matter, then you or your attorney must:

1. File with the Court, at the address below, a written response pursuant to Local Rule 9013-1(H).

Clerk of Court
United States Bankruptcy Court
600 Granby Street
4th Floor
Norfolk, VA 23501

2. You must also mail a copy to:

John W. Lee, P.C.
2017 Cunningham Dr.
Suite 402
Hampton, VA 23666

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting that relief.

John W. Lee, Esq. (VSB# 42937)
John W. Lee, P.C.
2017 Cunningham Dr.
Suite 402
Hampton, VA 23666
Telephone: 757-896-0868
Fax: 757-896-0679
Proposed Counsel for the Debtors

LEONARD J. DINGESS
ANGELA F. DINGESS

By Proposed Counsel:

/s/ John W. Lee
John W. Lee, Esq. (VSB# 42937)
John W. Lee, P.C.
2017 Cunningham Dr.
Suite 402
Hampton, VA 23666
Telephone: 757-896-0868
Fax: 757-896-0679
Proposed Counsel for the Debtors

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and accurate copy of the foregoing to the Trustee, U.S. Trustee, the debtors, and all creditors listed on the attached List of Service, pursuant to Rule 7004 of the Federal Rules of Bankruptcy Procedure on this 22nd day of February 2014. Creditors noted with an * on the List of Service have been served via certified mail.

/s/ John W. Lee
John W. Lee

John W. Lee, Esq. (VSB# 42937)
John W. Lee, P.C.
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Proposed Counsel for the Debtors

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Case No. 11-74000

Chapter 13

MOTION TO SUBSTITUTE COUNSEL

COMES NOW Leonard J. Dingess and Angela F. Dingess (the “Debtors”), by proposed counsel, and file the following Motion to Substitute Counsel, and affirmatively state as follows:

Jurisdiction

1. Jurisdiction of this Court over the instant matter is based upon 28 U.S.C. §§1334 and 157 in that this action arises in and relates to the bankruptcy case of the Debtor(s).
2. This proceeding is a core proceeding under 28 U.S.C. §157(b)(2)(A), (B), (K), and (O).
3. Venue is proper pursuant to 28 U.S.C. §1409.

Facts

4. On August 31, 2011 (hereinafter the “Petition Date”), the Debtor(s) filed a petition for relief under Chapter 13 of the Bankruptcy Code.
5. Counsel of record in the instant case is Seth A. Schoenfeld.

John W. Lee, Esq. (VSB# 42937)
John W. Lee, P.C.
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Suite 402
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Proposed Counsel for the Debtors

6. Debtor(s) have a desire to have John W. Lee and John W. Lee, P.C. substitute as counsel of record and represent the Debtor(s) in their case.
7. Debtor(s) aver that the substitution would be in their best interest.

WHEREFORE, for the foregoing reasons, Leonard J. Dingess and Angela F. Dingess, respectfully request that this Honorable Court enter an Order granting John W. Lee and John W. Lee, P.C. as counsel in the instant case and for such other and further relief as the Court shall deem appropriate.

LEONARD J. DINGESS
ANGELA F. DINGESS

By Proposed Counsel:

/s/ John W. Lee
John W. Lee, Esq. (VSB# 42937)
John W. Lee, P.C.
2017 Cunningham Dr.
Suite 402
Hampton, VA 23666
Telephone: 757-896-0868
Fax: 757-896-0679
Proposed Counsel for the Debtor

CERTIFICATE OF SERVICE

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/s/ John W. Lee
John W. Lee

List of Service

Office of the U.S. Trustee
Federal Building, Room 625
200 Granby Street
Norfolk, VA 23510-0000

ATT Univeral Platinum
PO BOX 6500
Sioux Falls, SD 57117-0000

BAC Home Loans Svc, LP
P O Box 660694
Dallas, TX 75266-0694

Bank of America Home Loan
PO BOX 5170
Simi Valley, CA 93062-0000

Barclays Bank Delaware
P.O. Box 8803
Wilmington, DE 19899-0000

Best Buy
PO BOX 5253
Carol Stream, IL 60197-0000

Capital One
Attn. Bankruptcy Dept
PO Box 5155
Norcross, GA 30091-0000

Chase
Attn: BK Dept
2901 Kinwest Pkwy, Suite 300
Irving, TX 75063-0000

Citizens Financial Services
3409 South Bouleva
Columbus, OH 43228-0000

Credit Union of Ohio
5500 Britton Pkwy
Hilliard, OH 43026-0000

Credit Union of Ohio
1169 Dublin Road
Columbus, OH 43215-1005

Fifth Third Bank
5050 Kingsley Drive
Cincinnati, OH 45227-0000

Ford Motor Credit Company
National BK Service Center
PO BOX 537901
Livonia, MI 48153-7901

GE Capital/ HH Gregg
PO BOX 981439
El Paso, TX 79998-0000

GE Money Bank
Attn Bankruptcy Department
PO BOX 960061
Orlando, FL 32896-0661

GE Money Bank /SAMS's Club
Attn Bankruptcy Department
PO BOX 960061
Orlando, FL 32896-0661

GE Money Bank/Dick's Sporting
Attn Bankruptcy Department
PO BOX 960061
Orlando, FL 32896-0661

Westgate Resorts
PO BOX 628014
Orlando, FL 32862-0000

GE Money Bank/SAM's Club
Attn Bankruptcy Department
PO BOX 960061
Orlando, FL 32896-0661

Westgate Smokey Mountain
Resort at Gatlinburg Owners
5601 Windhover Drive
Orlando, FL 32819-0000

Home Depot
PO BOX 653000
Dallas, TX 75262-3000

Kaitlyn Potter
5057 Regina Lane
Virginia Beach, VA 23455-0000

Kohl's
P O Box 3120
Milwaukee, WI 53201-0000

US Bank N.A.
BK Department
PO BOX 5229
Cincinnati, OH 45201-5229

Wells Fargo
PO BOX 84712
Sioux Falls, SD 57118-0000

Westgate Resorts
2801 Old Winter Garden Road
Ocoee, FL 34761-0000